

**From:** [Lapcevic, Joseph P](#)  
**To:** [Flanders, Phillip](#)  
**Cc:** [Jordan, Ronald](#); [Schroeder, Cuc](#); [Thomas Finseth](#); [Cannon, William E](#)  
**Subject:** RE: Follow up on call from 4/10/14  
**Date:** Friday, May 02, 2014 1:25:56 PM  
**Attachments:** [Hatfield FGD306Data 06-30-2009 to 12-10-2013.xlsx](#)  
[HatfieldIMP306Data7-1-2009to11-30-2011RawEdited.xlsx](#)  
[PA0002941\\_6\\_2009jpl306only.xlsx](#)

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Phil,

Below are my responses to your additional questions:

1. Pull data from 11/29/2011 to 11/6/2012 - I pulled the missing data from our LIMS system and inserted it on the attached spreadsheet. The June 30, 2009 sample was missing from our LIMS, but I retrieved the data from Hatfield's June '09 DMR. Since there was only one sample for the month, the average and maximum reported for June '09 are identical. I included a copy of the June '09 DMR.
2. Determine when FirstEnergy Beta Lab began using method 200.8 and let us know if any of the arsenic results were taken using 200.8 (and if so what were the MDL and RL for those samples) - The only Hatfield FGD-WWTP effluent samples that FE's Beta Lab ever analyzed using Method 200.8 were three samples collected for data that was submitted to PADEP on an NPDES Application form (similar to EPA Form 2c). Those samples were collected on 11/29, 12/19, & 12/21 and CRC correction was not used.
3. Check TestAmerica lab reports to see if 35 ppt MDL is correct and find the quantitation limit. - The arsenic samples dated 11/29/2012, 12/19/2012, & 12/21/2012 where all run by Beta Lab (see Item #2 above). Beta's current MDL for arsenic by 200.8 is 0.035- µg/L and their PQL is 1.0- µg/L. The MDL & PQL were likely similar at the time these analyses were performed.
4. Determine when the commissioning period for the treatment system ended. Check performance testing conducted by Siemens. - Performance testing was conducted on April 15, 21, 22, 23 & 26, 2010. Siemens wanted to wait for all three scrubbers to come online and for the FGD-WWTP to stabilize before conducting their testing. However, testing revealed that influent characteristics exceeded design, which in turn caused a few effluent parameters to sometimes exceed Siemens guarantee. Most notably were influent solids levels. Metals that exceeded guarantee in a couple of samples were iron and manganese. All mercury results were below the MDL, but Siemens report did not provide the MDL, or test method. The arsenic values were 12.8 µg/L and 8.3 µg/L, with the other three sample results being below the MDL - again, the method and MDL were not provided in Siemens report.

5. Look at laboratory reports to confirm data entry for mercury data points that seem unusually high (e.g. 1/5/10, 1/12/10, 1/19/10, 3/29/11, etc.). - Lab reports for mercury analysis from GeoChem Labs that were conducted prior to December 2012 are no longer available. For samples analyzed after December 2012, Beta Lab reviewed several of GeoChem's lab reports that had mercury levels above 0.49- $\mu$ g/L. Only one, the January 17, 2012 sample, was the result of a transcription error. The correct value from the lab report was 0.0715-  $\mu$ g/L, which was corrected on the spreadsheet.
6. Mercury samples collected at IMP-306, Hatfield's FGD-WWTP effluent, were all collected as grabs using clean sampling techniques. Only one sample was collected for each day. The permit modification contained a typo incorrectly specified 24-hour composite sampling for the low level mercury samples. PADEP agreed that because they wanted low level mercury analysis, the sample type should be "grab."
7. Regarding whether Allegheny's Chem Lab (AE Chem Lab) developed PQLs/RLs, the consensus is that they probably did calculate one, but because of the WVDEP requirement to report to the MDL, AE Chem Lab elected to report all their results to the MDL and never advertised their PQL/RL numbers. Bottom line, I have listings of AE Chem Lab's MDLs, but nothing with a PQL/RL value.
8. Also, I've attached a spreadsheet with AE Chem Lab data for the other metals that were analyzed with the arsenic samples. The Beta Lab data does not extract from LIMS as cleanly. I'll forward it later after sorting it into a meaningful format.

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**From:** Flanders, Phillip [mailto:[Flanders.Phillip@epa.gov](mailto:Flanders.Phillip@epa.gov)]  
**Sent:** Tuesday, April 22, 2014 2:29 PM  
**To:** Lapcevic, Joseph P  
**Cc:** Jordan, Ronald; Schroeder, Cuc; Thomas Finseth  
**Subject:** Follow up on call from 4/10/14

Hi Joe,

I wanted to take a moment to follow up with you on some action items concerning data from Hatfield's Ferry. Have you gotten a chance to address some of the lingering questions. The list of action items I have includes:

1. Pull data from 11/29/2011 to 11/6/2012
2. Determine when FirstEnergy Beta Lab began using method 200.8 and let us know if any of the arsenic results were taken using 200.8 (and if so what were the MDL and RL for those samples)
3. Check TestAmerica lab reports to see if 35 ppt MDL is correct and find the quantitation limit.
4. Determine when the commissioning period for the treatment system ended. Check performance testing conducted by Siemens.
5. Look at laboratory reports to confirm data entry for mercury data points that seem unusually high (e.g. 1/5/10, 1/12/10, 1/19/10, 3/29/11, etc.)

Thanks in advance for taking the time to check on these things for us,

Phillip Flanders, Ph.D.

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